

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC., et al.,

Debtors.

Chapter 11

Case No. 24-12480 (JTD)

(Joint Administration Requested)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Farnan LLP, and White & Case LLP, attorneys for Ad Hoc Group of Freedom Lenders file this Notice of Appearance and Request for Service of Papers, pursuant to Rules 2002, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Sections 102(1), 342, and 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), and requests that copies of all notices and pleadings given or required to be given in this case, be given to and served upon:

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PLEASE TAKE FURTHER NOTICE that, pursuant to Rules 2002 and 9010(b) of the Bankruptcy Rules and section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any and all orders, notices, hearing dates, applications, motions, petitions, pleadings, requests, objections, complaints, demands, replies, statements of affairs, schedules of assets and liabilities, operating reports, plans of reorganization, disclosure statements, and other filings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile, telecopy, e-mail or otherwise filed with regard to this case and any proceedings thereon.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Papers shall not be deemed or construed to be (i) a waiver of the right of Ad Hoc Group of Freedom Lenders (a) to have final orders entered only after *de novo* review by a United States District Court, (b) to trial by jury in any proceedings so triable in these cases or any case, controversy, or proceeding related to these cases, (c) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (d) to object to the jurisdiction or venue of the Court or venue of these cases, or (ii) a waiver of any other rights, remedies, claims, actions, defenses, setoffs, or recoupments, as appropriate, to which Ad Hoc Group of Freedom Lenders is or may be entitled in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Ad Hoc Group of Freedom Lenders expressly reserves.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby demands that the

names and addresses set forth herein be added to the mailing matrix in these cases.

Dated: November 4, 2024

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

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